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7 *Attorney for Defendant*  
8 *Pedro Montalvo*

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 ADALI ARNULFO ESCALANTE-  
15 TRUJILLO, et al.,

16 Defendants.

2:20-cr-00156-RFB-DJA

**UNOPPOSED MOTION TO  
ALLOW TRAVEL**

17 Certification: This motion is timely filed.

18 Comes now the defendant, Pedro Montalvo, by and through his counsel  
19 of record, William Brown, of BROWN MISHLER, PLLC, and hereby moves  
20 this court for permission to travel to California on various dates for court-  
21 approved visitation with his children. This request is based on the Points and  
22 Authorities attached hereto.  
23

24 Dated: September 8, 2020

25 By /s/ William H. Brown  
26 WILLIAM H. BROWN  
27 *Attorney for Pedro Montalvo*  
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**MEMORANDUM OF  
POINTS AND AUTHORITIES**

Defendant Pedro Montalvo's pretrial release conditions forbid out-of-state travel and Montalvo therefore seeks permission from the Court to travel California for court-approved visitation with his children pursuant to a California custody order following a custody hearing on August 19, 2020. The dates of visitation (and requested dates of travel) are:

1. Sept. 18<sup>th</sup>-21<sup>st</sup>;
2. Oct. 2<sup>nd</sup>-5<sup>th</sup>;
3. Oct. 16<sup>th</sup>-19<sup>th</sup>;
4. Nov. 6<sup>th</sup>-9<sup>th</sup>;
5. Nov. 20<sup>th</sup>-23<sup>rd</sup>;
6. Dec. 4<sup>th</sup>-7<sup>th</sup>; and
7. Dec. 18<sup>th</sup>-21<sup>st</sup>.

The defense has communicated with Montalvo's Pretrial Services Officer, and the government, and neither opposes this request.

Dated: September 8, 2020

By /s/ William H. Brown  
WILLIAM H. BROWN  
*Attorney for Pedro Montalvo*

**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that he is an employee of BROWN MISHLER, PLLC, and is a person of such age and discretion as to be competent to serve papers, and that on September 8, 2020 he served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO ALLOW TRAVEL** by electronic service (ECF)

/s/ William Brown

Employee of BROWN MISHLER,  
PLLC

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7 *Attorney for Defendant*  
8 *Pedro Montalvo*

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

2:20-cr-00156-RFB-DJA

12 Plaintiff,

**[PROPOSED]**

13 vs.

**ORDER ALLOWING TRAVEL**

14 ADALI ARNULFO ESCALANTE-  
15 TRUJILLO, et al.,

16 Defendants.

17 Having considered defendant Pedro Montalvo's unopposed motion for  
18 travel, it is hereby ordered that the motion is granted, such that Montalvo  
19 may travel to California for child visitation on the following dates:  
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- 21 1. Sept. 18<sup>th</sup>-21<sup>st</sup>;
- 22 2. Oct. 2<sup>nd</sup>-5<sup>th</sup>;
- 23 3. Oct. 16<sup>th</sup>-19<sup>th</sup>;
- 24 4. Nov. 6<sup>th</sup>-9<sup>th</sup>;
- 25 5. Nov. 20<sup>th</sup>-23<sup>rd</sup>;
- 26 6. Dec. 4<sup>th</sup>-7<sup>th</sup>; and
- 27
- 28

1 7. Dec. 18<sup>th</sup>-21<sup>st</sup>.

2  
3 Dated: September 9<sup>th</sup> 2020.



4 RICHARD F. BOULWARE, II  
5 UNITED STATES DISTRICT JUDGE  
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